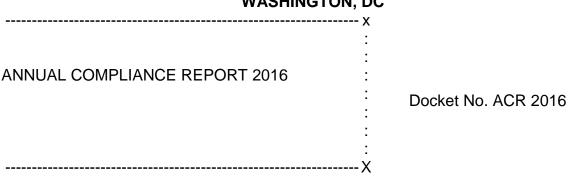
Postal Regulatory Commission Submitted 2/9/2017 3:36:31 PM Filing ID: 99004 Accepted 2/9/2017

BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, DC



MOTION OF THE NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO FOR ACCESS TO NONPUBLIC MATERIALS

Pursuant to 39 C.F.R. §3007.50, the National Association of Letter Carriers, AFL-CIO ("NALC") hereby requests access to two sets of nonpublic materials provided to the Commission by the United States Postal Service ("USPS"): (1) USPS-FY16-NP13, a non-public library reference filed by the United States Postal Service ("USPS") in Docket No. ACR 2016 on December 29, 2016; and (2) material related to demand analyses for competitive categories of mail, updated with FY 2016 volume and price data, submitted by USPS to the Commission in a January 23, 2017 letter (hereafter, "competitive mail demand analyses"). NALC has conferred with USPS regarding this request and represents to the Commission that USPS has no objection to the instant motion.

NALC, which serves as the collective bargaining representative of city letter carriers employed by USPS, seeks these materials for its outside consultants to assist in making informed and meaningful comments in Docket No. ACR2016 and other matters pending before the Commission.

The individuals to whom NALC plans to provide copies of USPS-FY2016-NP13 and the competitive mail demand analyses are individuals who are serving as consultants to NALC.

They are:

John D. Waller, Economic Postal Consultant

Charles C. McBride, Postal Consultant

Robert Cohen, Postal Consultant

R. Kevin Harle, Economic Consultant

Attached are executed declarations by these individuals committing to their compliance with the terms of the protective conditions established by the Commission to limit the disclosure and use of the non-public material.

February 9, 2017

Respectfully submitted,

/s/ Peter D. DeChiara
Peter D. DeChiara
Cohen Weiss and Simon LLP
330 West 42nd Street
New York, NY 10036
Tel: (212) 356-0216

Tel: (212) 356-0216 Fax: (646) 473-8216

Email: pdechiara@cwsny.com

Attorneys for National Association of Letter Carriers, AFL-CIO

The undersigned represents that:

Access to these materials provided in (1) the matter identified as USPS-FY16-NP13 by the Postal Service and (2) a CD-ROM referenced in a January 23, 2017 letter from the Postal Service to the Commission related to demand analyses of mail categories in the competitive domain has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue before the Commission. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name <u>J</u>	ohn D Waller	_
Firm (if	any)	
Title (if	any) Economic Posta	l Consultant
Signatur	e John D Wally	
Date	February 9, 2017	Text

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The undersigned represents that:

Access to these materials provided in (1) the matter identified asUSPS-FY16-NP13bythe Postal Service and (2) a CD-ROM referenced in a January 23, 2017 letter from the Postal Service to the Commission related to demand analyses of mail categories in the competitive domain has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue before the Commission. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name Charles C. McBride
Firm(if any)
Title(if any) Postal Consultant
Signature Mully C. Mullinde
Date

The undersigned represents that:

Access to these materials provided in (1) the matter identified as USPS-FY16-NP13 by the Postal Service and (2) a CD-ROM referenced in a January 23, 2017 letter from the Postal Service to the Commission related to demand analyses of mail categories in the competitive domain has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue before the Commission. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name ROBERT COHEN
Firm (if any)
Title (if any) 109 TAL CONSULTART
Signature Robert Coler
Date 2/9/17

The undersigned represents that:

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Name R. Kevin Harle
Firm (if any)
Title (if any) Economic Consultant
Signature 5
Date 2/8/17